

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MAYLENE OTERO, Individually and as Parent and
Natural Guardian of K.R.O.,

Plaintiff,

**DECLARATION OF
JAIMINI VYAS**

- against -

25-cv-2773 (PAE)

MELISSA AVILÉS-RAMOS, in her official capacity as
Chancellor of the New York City Department of Education,
and the NEW YORK CITY DEPARTMENT OF
EDUCATION,

Defendants.

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Jaimini Vyas, an attorney duly admitted to practice law in the State of New York and before this Court, declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following statements are true and correct:

1. The undersigned is an Assistant Corporation Counsel within the General Litigation Division of the New York City Law Department representing Defendants Melissa Avilés-Ramos and the New York City Department of Education (collectively, “Defendants”) in this matter, and is fully familiar with the facts asserted herein.

2. This Declaration is submitted in support of Defendants’ Opposition to Plaintiff’s proposed Order to Show Cause for a Preliminary Injunction.

3. Attached hereto as Exhibit A is a copy of the Transcript of the January 17, 2025,¹

¹ The first page of the transcript contains a typographical error in stating that the conference took place on January 17, 2024 rather than the accurate January 17, 2025 date.

Hearing denying Plaintiffs' third motion for an emergency preliminary injunction demanding payments in *Thomas et al. v. Banks et ano.*, 24-cv-5138 (JLR).

4. Attached hereto as Exhibit B is a copy of the Transcript of the January 5, 2024, Hearing on Plaintiffs' motion for an emergency preliminary injunction demanding payments in *Grullon et al. v. Banks et al.*, 23-cv-10388 (KPF).

Dated: April 23, 2025
New York, New York

MURIEL GOODE-TRUFANT

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Jaimini A. Vyas
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